

JS-6

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

THE AMERICAN AUTOMOBILE
ASSOCIATION, INC.,

Plaintiff,

v.

DESIGNER TICKETS & TOURS,
INC. d/b/a AAA ATTRACTIONS

Defendants.

Case No. 8:24-cv-02335-AH-(JDEx)

FINAL JUDGMENT

Pursuant to the Court's Order granting Plaintiff's Amended Application for Default Judgment, IT IS HEREBY ORDERED, ADJUDGED, and DECREED:

1. That Defendant, its agents, attorneys, representatives, employees, and all persons in active concert or participation with any of them are hereby permanently enjoined and restrained from using, without Plaintiff's authorization, any of the AAA Marks, including, without limitation, the designation "AAA" and any other name, logo, or mark that is confusingly or deceptively similar to the AAA Marks, logos, or trade names, either alone or in conjunction with other words or symbols, as part of any trademark, service mark, logo, trade name, corporate name, assumed name, domain name, on or in relation to any goods sold or distributed by the Defendant, or in any other manner; and from using combination letter "A's" in any form or manner that

1 would tend to identify or associate Defendant or its business or services with Plaintiff,
2 including in the marketing, promotion, advertising, identification, sale or distribution
3 of goods or services, or in any other manner;

4 2. Within thirty (30) days after service of the Judgment on Defendant,
5 pursuant to 15 U.S.C. § 1118 and California law, Defendant shall destroy all
6 literature, signs, labels, prints, packages, wrappers, containers, advertising materials,
7 internet content, stationery, software, and other items in its possession or control that
8 contain the infringing mark, the designation “AAA,” or any other term confusingly
9 similar to “AAA,” either alone or in combination with other words or symbols and to
10 destroy all plates, molds, matrices, masters, and other means of making any of those
11 infringing items;

12 3. Within thirty (30) days after service of the Judgment on Defendant,
13 Defendant shall abandon, cancel, delete, and/or withdraw, with prejudice, any U.S. or
14 state trademark applications or registrations that contain the AAA Marks, or any other
15 confusingly similar name, logo, or mark;

16 4. Within thirty (30) days after service of the Judgment on Defendant,
17 Defendant shall file all documentation necessary to cancel or amend any business
18 names, trade names, licenses, or corporate registrations or applications associated with
19 the infringing mark that incorporate the AAA Marks and any other corporate or
20 business registrations, registered trade names, or business licenses controlled by
21 Defendant that contain the AAA Marks or any other confusingly similar name, logo,
22 or mark, and Defendant shall take all further necessary actions to cancel or amend
23 these records within one week of receiving notice that such actions are necessary;

24 5. Within thirty (30) days after service of the Judgment on Defendant,
25 Defendant shall transfer to Plaintiff any and all domain names in its or its agents’
26 possession, custody, or control that include the AAA Marks, including
27 AAAATTRactions.COM;

28 6. Within thirty (30) days after service of the Judgment on Defendant,

1 Defendant shall file with the Clerk of this Court and serve on Plaintiff, a report in
2 writing, under oath, setting forth in detail its compliance therewith; and

3 7. The Clerk of the Court shall close this case, except that this Court shall
4 retain jurisdiction for the purpose of enforcing this Order.

5 This is a final judgment.

6 Dated: March 13, 2025


7 HON. ANNE HWANG
8 UNITED STATES DISTRICT JUDGE
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